

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES M. CHAPMAN,

Defendant.

No. 17-05027-01-CR-SW-RK

STIPULATED FACTUAL BASIS FOR CHANGE OF PLEA HEARING

COMES NOW, the United States of America, by and through Thomas M. Larson, Acting United States Attorney for the Western District of Missouri, and undersigned counsel, and the defendant, James M. Chapman, and his counsel, Michelle Law, and sets forth the below agreed-upon factual basis for the change of plea hearing scheduled for November 20, 2017.

For purposes of the change of plea hearing, and to provide factual support for the defendant's pleas of guilty to Counts 1 and 2 of the indictment, the parties agree to the following factual basis:

1. The defendant, James M. Chapman, was an employee for the United States Postal Service between May 1, 2016, and February 23, 2017, in that he was a postal carrier during that time.

2. The United States Postal Service is an independent establishment of the executive branch of the United States government, responsible for providing postal service in the United States.

3. Between May 1, 2016, through February 23, 2017, in Newton County, and elsewhere, in the Western District of Missouri, the defendant, in his role as a postal carrier for the

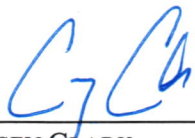
United States Postal Service, took cash from the mail matter entrusted to him and which was intended to be conveyed by mail; to wit: the defendant removed cash, in the form of United States currency, from a card that was intended to be conveyed by mail and did so with the intent to convert the cash to his own use.

4. Between December 5, 2016, through February 23, 2017, in Newton County, and elsewhere, in the Western District of Missouri, the defendant, in his role as a postal carrier, delayed the delivery of a package and a letter entrusted to him and which were intended to be conveyed by mail, to wit: the defendant delayed a package with a postmark date of December 4, 2016, and a letter from delivery to its addressees.

Respectfully submitted,

THOMAS M. LARSON
Acting United States Attorney

Dated: 11/20/17



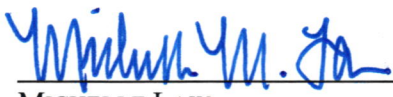
CASEY CLARK
Assistant United States Attorney

Dated: 11-20-17



JAMES M. CHAPMAN
Defendant

Dated: 11/20/2017



MICHELLE LAW
Attorney for Defendant